### **EXHIBIT B**

# Case 1:17-cv-01789-DLC Document 425-2 Filed 09/13/19 Page 2 of 16 Avalon Gmail Searches

		Produced by	Produced by	Produced by
Z First Bates	Z Last Bates	Avalon	Fayyer	Other Parties
Z-006033538	Z-006033538	No	No	USDJ
Z-006120143	Z-006120147	No	No	USDJ
Z-006164337	Z-006164344	No	No	USDJ
Z-006120306	Z-006120325	No	No	USDJ
Z-006164659	Z-006164661	No	No	USDJ
Z-006035349	Z-006035351	No	No	USDJ
Z-006129244	Z-006129247	No	No	USDJ
Z-006175409	Z-006175409	No	No	USDJ
Z-006188279	Z-006188292	No	No	USDJ
Z-006086602	Z-006086602	No	No	USDJ
Z-006035850	Z-006035851	No	No	USDJ
Z-006112764	Z-006112765	No	No	USDJ
Z-006041294	Z-006041295	No	No	USDJ
Z-006127628	Z-006127629	No	No	USDJ
	Z-006033538 Z-006120143 Z-006164337 Z-006120306 Z-006164659 Z-006035349 Z-006129244 Z-006175409 Z-006188279 Z-006086602 Z-006035850 Z-006112764 Z-006041294	Z-006033538Z-006033538Z-006120143Z-006120147Z-006164337Z-006164344Z-006120306Z-006120325Z-006164659Z-006164661Z-006035349Z-006035351Z-006129244Z-006129247Z-006175409Z-006175409Z-006188279Z-006188292Z-006086602Z-006035851Z-006112764Z-006112765Z-006041294Z-006041295	Z First Bates         Z Last Bates         Avalon           Z-006033538         Z-006033538         No           Z-006120143         Z-006120147         No           Z-006164337         Z-006164344         No           Z-006120306         Z-006120325         No           Z-006164659         Z-006164661         No           Z-006035349         Z-006035351         No           Z-006129244         Z-006129247         No           Z-006175409         Z-006175409         No           Z-006188279         Z-006188292         No           Z-006086602         Z-006086602         No           Z-006012764         Z-006012765         No           Z-006041294         Z-006041295         No	Z First Bates         Z Last Bates         Avalon         Fayyer           Z-006033538         Z-006033538         No         No           Z-006120143         Z-006120147         No         No           Z-006164337         Z-006164344         No         No           Z-006120306         Z-006120325         No         No           Z-006164659         Z-006164661         No         No           Z-006035349         Z-006035351         No         No           Z-006129244         Z-006129247         No         No           Z-006175409         Z-006175409         No         No           Z-006188279         Z-006188292         No         No           Z-006086602         Z-006086602         No         No           Z-006035850         Z-006035851         No         No           Z-006112764         Z-006012765         No         No           Z-006041294         Z-006041295         No         No

Note: US Attorney's Office (USAO) for the District of New Jersey is abbreviated as USDJ

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Document Name	First Bates	Last Bates	Searches Conducted		Search Results First Bates Last Bates		Received Production	Notes
SEC Trial Exhibit 1	Z-006033538	Z-006033538	Apply smart filters		riist bates	Last bates		
SEC IIIdi Exilibit 1	2 000033330	2 000033330	Sender address equals avalonfaltd@gmail.com	1	Z-006033538	Z-006033538	USDJ-20151231	
			Recipient address equals reggy@allnewstar.com	2	Z-004031124	Z-004031124	USDJ-20160510	
			Search in email subject for "hello from serge"	_	2 00 100112 1	2 00 100112 1	0020 2020020	
			(name pre/2 nathan) and (receiv* pre/2 contact pre/2					
			serge)	1	Z-006033538	Z-006033538	USDJ-20151231	2 hits on 1/18/2013 1:31pm; 2
			sent date equals 1/18/2013	2	Z-004031124	Z-004031124	USDJ-20160510	additional docs all produced by USDJ
			"group of traders"	1	Z-006033538	Z-006033538	USDJ-20151231	2 hits on 1/18/2013 1:31pm; 2
			"accounts for layering"	2	Z-004031124	Z-004031124	USDJ-20160510	additional docs all produced by USDJ
			"other different strategies"					
			sent date equals 1/18/2013					
			"still allow layering"	1	Z-006033538	Z-006033538	USDJ-20151231	2 hits on 1/18/2013 1:31pm; 2
			sent date equals 1/18/2013	2	Z-004031124	Z-004031124	USDJ-20160510	additional docs all produced by USDJ

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Document Name	First Bates	Last Bates	Searches Conducted	Search Results		Received Production	Notes
CEC Tailed Each libit 2	7 006430443	7 006420447	Annals are at filters	First Bates	Last Bates		
SEC Trial Exhibit 2	Z-006120143	Z-006120147	Apply smart filters				
			Sender address equals avalonfaltd@gmail.com 1	Z-00612014	Z-006120147	USDJ-20151231	3 hits on 3/7/2013 9:29am; 2 additional
			Recipient address equals reg.xia@gmail.com 2	Z-00403167	Z-004031675	USDJ-20160510	docs all produced by USDJ
			Sent date equals 3/7/2013 3	Z-00616419	Z-006164195	USDJ-20151231	
			"serge works directly for the broker" 1 "brokerafe company" 2 3	Z-00612014. Z-00403167/ Z-00616419.	Z-004031675	USDJ-20151231 USDJ-20160510 USDJ-20151231	3 hits on 3/7/2013 9:29am; 15 additional docs all produced by USDJ
			"for layering it is a bit more costly" 1	Z-00612014	3 Z-006120147	USDJ-20151231	3 hits on 3/7/2013 9:29am; 45
			"we pay very big legal bills"	Z-00403167	Z-004031675	USDJ-20160510	additional docs all produced by USDJ
			3	Z-00616419	Z-006164195	USDJ-20151231	

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<b>Document Name</b>	First Bates	Last Bates	Searches Conducted		Search First Bates	n <b>Results</b> Last Bates	Received Production	Notes
SEC Trial Exhibit 3	Z-006164337	7-006164344	Apply smart filters		riist bates	Last bates		
SEC THAI EXHIBIT S	2 000104337	2 000104344	Sender address equals avalonfaltd@gmail.com	1	Z-006164337	Z-006164344	USDJ-20151231	
			Recipient address equals reg.xia@gmail.com	2	Z-004031703	Z-004031710	USDJ-20160510	
			Sent date equals 3/11/2013	-	2 00 10017 00	2 00 1001710	0000 20100010	
								0.1.1.
			"layering strategy"	1	Z-006164337	Z-006164344	USDJ-20151231	2 hits on 3/11/2013 12:04pm; 5
			"payout is only what I have written below"	2	Z-004031703	Z-004031710	USDJ-20160510	additional docs all produced by USDJ
			"for layering strategy payout only"	1	Z-006164337	Z-006164344	USDJ-20151231	2 hits on 3/11/2013 12:04pm; 10
				2	Z-004031703	Z-004031710	USDJ-20160510	additional docs all produced by USDJ
			"pls advise for lawying"	1	Z-006164337	Z-006164344	USDJ-20151231	2 hits on 3/11/2013 12:04pm; 12
			F	2	Z-004031703	Z-004031710	USDJ-20160510	additional docs all produced by USDJ

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Document Name	First Bates	Last Bates	Searches Conducted	Search Results		Received Production	Notes	
CCC Taial Cabibit 4	7.00(12020)	7 000120225	Analy, annual filhous		First Bates	Last Bates		
SEC Trial Exhibit 4	Z-006120306	Z-006120325	Apply smart filters					
			Sender address equals avalonfaltd@gmail.com	1	Z-006120306	Z-006120314	USDJ-20151231	
			Recipient address equals reg.xia@gmail.com	2	Z-004031745	Z-004031753	USDJ-20160510	
			Sent date equals 3/12/2013					
			Include Families	1	Z-006120315	Z-006120315	USDJ-20151231	
				2	Z-006120316	Z-006120325	USDJ-20151231	
				3	Z-004031754	Z-004031754	USDJ-20160510	
				4	Z-004031755	Z-004031764	USDJ-20160510	
				4	2-004031733	2-004031704	03DJ-20100310	
			"both payout schedules"	1	Z-006120306	Z-006120314	USDJ-20151231	2 hits on 3/11/2013 5:19pm; 1
			both payout schedules	1				
				2	Z-004031745	Z-004031753	USDJ-20160510	additional doc produced by USDJ
			"layering and normal trading"	1	Z-006120306	Z-006120314	USDJ-20151231	2 hits on 3/11/2013 5:19pm; 1
				2	Z-004031745	Z-004031753	USDJ-20160510	additional doc produced by USDJ
			•	-	2 00-0317-13	2 00-1031733	0323 20100310	additional doc produced by 03b3

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<b>Document Name</b>	First Bates	Last Bates	Searches Conducted			Results	Received Production	Notes
SEC Trial Exhibit 5	Z-006164659	Z-006164661			First Bates	Last Bates		
			"bp works differently depending on strategy"	1	Z-006164659	Z-006164661	USDJ-20151231	2 hits on 3/15/2013 11:15am; 125
			ap none amount, copenant on states,	2	Z-004034939	Z-004034942	USDJ-20160510	additional docs all produced by USDJ
			"layering strategies" and "send \$2500 per account"	1	Z-006164659	Z-006164661	USDJ-20151231	2 hits on 3/15/2013 11:15am; 125
				2	Z-004034939	Z-004034942	USDJ-20160510	additional docs all produced by USDJ
			"for layering" and "you can send 50-100" and "different					
			ECN'S"	1	Z-006164659	Z-006164661	USDJ-20151231	2 hits on 3/15/2013 11:15am; 125
				2	Z-004034939	Z-004034942	USDJ-20160510	additional docs all produced by USDJ

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Document Name	First Bates	Last Bates	Searches Conducted		Search First Bates	Results Last Bates	Received Production	Notes
SEC Trial Exhibit 6	Z-006035349	Z-006035351	Apply smart filters Sender address equals avalonfaltd@gmail.com Recipient address equals zchxia@gmail.com Sent date equals 3/28/2013 Search in email subject for "bloter detail"	1 2	Z-006035349 Z-004036331	Z-006035351 Z-004036333	USDJ-20151231 USDJ-20160510	
			"broker is not a cheap one" "tolerate and protect us"	1 2	Z-006035349 Z-004036331	Z-006035351 Z-004036333	USDJ-20151231 USDJ-20160510	2 hits on 3/28/2013 8:02pm; 21 additional docs all produced by USDJ
			(multi pre/1 key pre/1 trading) and ("not allowed")	1 2	Z-006035349 Z-004036331	Z-006035351 Z-004036333	USDJ-20151231 USDJ-20160510	2 hits on 3/28/2013 8:02pm; 21 additional docs all produced by USDJ
			"so you get what you pay for here"	1	Z-006035349 Z-004036331	Z-006035351 Z-004036333	USDJ-20151231 USDJ-20160510	2 hits on 3/28/2013 8:02pm; 21 additional docs all produced by USDJ

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Document Name	First Bates	Last Bates	Searches Conducted		Search	Results	Received Production	Notes
					First Bates	Last Bates		
SEC Trial Exhibit 7	Z-006129244	Z-006129247	Apply smart filters					
			Sender address equals avalonfaltd@gmail.com	1	Z-004036472	Z-004036475	USDJ-20160510	2 hits on 4/3/2013 12:00pm/ 12:01pm;
			Recipient address equals zchxia@gmail.com	2	Z-006129244	Z-006129247	USDJ-20151231	12 additional docs all produced by USDJ
			Sent date equals 4/3/2013					
			Search in email subject for "real fees"					
			contract pre/5 layering pre/1 spoofing	1	Z-004036472	Z-004036475	USDJ-20160510	2 hits on 4/3/2013 12:00pm; 12
				2	Z-006129244	Z-006129247	USDJ-20151231	additional docs all produced by USDJ
			account pre/5 charged pre/4 ML pre/1 key pre/1					
			strategy	1	Z-004036472	Z-004036475	USDJ-20160510	2 hits on 4/3/2013 12:00pm; 12
				2	Z-006129244	Z-006129247	USDJ-20151231	additional docs all produced by USDJ
			"dark pool layering" pre/5 strategies	1	Z-004036472	Z-004036475	USDJ-20160510	2 hits on 4/3/2013 12:00pm; 12
			dark poor layering pre/5 strategies	1				• •
				2	Z-006129244	Z-006129247	USDJ-20151231	additional docs all produced by USDJ
			"money for legal expenses"	1	Z-004036472	Z-004036475	USDJ-20160510	2 hits on 4/3/2013 12:00pm; 12
			"no other firms allow this"	2	Z-006129244	Z-006129247	USDJ-20151231	additional docs all produced by USDJ

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Document Name	First Bates	Last Bates	Searches Conducted		Search First Bates	Results Last Bates	Received Production	Notes
SEC Trial Exhibit 8	Z-006175409	7-006175409	Apply smart filters:		oc Bates	Edot Dates		
SEC THAI EXHIBIT O	2 000175405	2 000173403	Sender address equals avalonfaltd@gmail.com	1	Z-004036485	Z-004036485	USDJ-20160510	2 hits on 4/3/2013 12:28pm; 12
			Recipient address equals zchxia@gmail.com	2	Z-004030483 Z-006175409	Z-004030483	USDJ-20151231	additional docs all produced by USDJ
			Sent date equals 4/3/2013	2	2-006175409	2-000175409	03DJ-20131231	additional docs all produced by OSDJ
			Search in email subject for "real fees"					
			(charged pre/1 commission) pre/5 (contract pre/2					
			layering)	1	Z-004036485	Z-004036485	USDJ-20160510	2 hits on 4/3/2013 12:28pm; 31
				2	Z-006175409	Z-006175409	USDJ-20151231	additional docs all produced by USDJ
				_	2 0002/3 103	2 0001/0 100	0000 20101201	audicional acts an produced 2, coss
			rebate pre/1 for pre/1 layering	1	Z-004036485	Z-004036485	USDJ-20160510	2 hits on 4/3/2013 12:28pm; 33
				2	Z-006175409	Z-006175409	USDJ-20151231	additional docs all produced by USDJ
			(layering pre/1 spoofing) and "regular trading" and "one					
			account"	1	Z-004036485	Z-004036485	USDJ-20160510	2 hits on 4/3/2013 12:28pm; 45
				2	Z-006175409	Z-006175409	USDJ-20151231	additional docs all produced by USDJ

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<b>Document Name</b>	First Bates	Last Bates	Searches Conducted		Search First Bates	Results Last Bates	Received Production	Notes
SEC Trial Exhibit 9	7 006199370	7 006199202	Apply smart filters:		riist bates	Last Bates		
SEC IIIai Exilibit 9	2-000100279	2-000100292	Sender address equals avalonfaltd@gmail.com	1	Z-006188279	Z-006188280	USDJ-20151231	2 hits on 11/4/2014 5:49pm; 8
			Recipient address equals laviensmile@gmail.com		Z-000188279 Z-003987883	Z-008188280 Z-003987884	USDJ-20151231 USDJ-20160510	additional docs all produced by USDJ
			Sent date equals 11/4/2014	2	2-005967665	2-003967664	03DJ-20100310	additional docs all produced by OSDI
			Add families		Z-006188281	Z-006188292	USDJ-20151231	attachment to Z-006188279
					Z-003987885	Z-003987896	USDJ-20160510	attachment to Z-003987883
			"i'm not sure" pre/10 "regarding the commission"	1	Z-006188279	Z-006188280	USDJ-20151231	2 hits on 11/4/2014 5:49pm; 6
			2	2	Z-003987883	Z-003987884	USDJ-20160510	additional docs all produced by USDJ
			Add families					
					Z-003987885	Z-003987896	USDJ-20160510	attachment to Z-003987883
					Z-006188281	Z-006188292	USDJ-20151231	attachment to Z-006188279
			(break pre/1 point) and commi* and 350M	1	Z-006188279	Z-006188280	USDJ-20151231	2 hits on 11/4/2014 5:49pm; 6
			2	2	Z-003987883	Z-003987884	USDJ-20160510	additional docs all produced by USDJ
			Add families					
					Z-003987885	Z-003987896	USDJ-20160510	attachment to Z-003987883
					Z-006188281	Z-006188292	USDJ-20151231	attachment to Z-006188279

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<b>Document Name</b>	First Bates	Last Bates	Searches Conducted		Search Results		Received Production	Notes
					First Bates	Last Bates		
SEC Trial Exhibit 10	Z-006086602	Z-006086602	Apply smart filters:					
			Sender address equals avalonfaltd@gmail.com	1	Z-006086602	Z-006086602	USDJ-20151231	
			Recipient address equals edisonlin1984@gmail.com	2	Z-006176693	Z-006176693	USDJ-20151231	
			Sent date equals 4/18/2013					
			"ten per ecn" and "50 orders max"	1	Z-006086602	Z-006086602	USDJ-20151231	2 hits on 4/18/2013 4:15pm; 1
			ten per een und 30 orders max	2	Z-006176693	Z-006176693	USDJ-20151231	additional doc produced by USDJ
			•	_	2 000170033	2 000170033	0303 20131231	additional doc produced by 0323
			"place 10 orders on each ecn" and "5 different ecns"	1	Z-006086602	Z-006086602	USDJ-20151231	2 hits on 4/18/2013 4:15pm; 1
			:	2	Z-006176693	Z-006176693	USDJ-20151231	additional doc produced by USDJ
			"only have 10 orders each ecn"	1	Z-006086602	Z-006086602	USDJ-20151231	2 hits on 4/18/2013 4:15pm; 3
				2	Z-006176694	Z-006176694	USDJ-20151231	additional doc produced by USDJ

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Document Name	First Bates	Last Bates	Searches Conducted		Search Results		Received Production	Notes
					First Bates	Last Bates		
SEC Trial Exhibit 11	Z-006035850	Z-006035851	Apply smart filters:					
			Sender address equals edisonlin1984@gmail.com	1	Z-006035850	Z-006035851	USDJ-20151231	
			Recipient address equals avalonfaltd@gmail.com					
			Sent date equals 7/9/2013					
			Search in email subject for "about overnight charges"					
								1 hit on 7/9/2013 12:35pm; 1 additional
			"we allow layering" and "these sort of strategies"	1	Z-006035850	Z-006035851	USDJ-20151231	
			we allow layering and these sort of strategies	1	2-006035850	2-006035851	05DJ-20151231	doc produced by USDJ
								1 hit on 7/9/2013 12:35pm; 1 additional
			"strategies only for intra day use"	1	Z-006035850	Z-006035851	USDJ-20151231	doc produced by USDJ

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<b>Document Name</b>	First Bates	Last Bates	Searches Conducted		Search Results		<b>Received Production</b>	Notes
0507:151:1:140	7.006440764	7 006440765			First Bates	Last Bates		
SEC Trial Exhibit 12	2-006112764		Apply smart filters: Sender address equals avalonfaltd@gmail.com Recipient address equals jiangbaba520@163.com Sent date equals 2/26/2012	1	Z-006112764	Z-006112765	USDJ-20151231	
			agreement pre/10 "only agent"	1	Z-006112764	Z-006112765	USDJ-20151231	
			"you have my support"	1	Z-006112764	Z-006112765	USDJ-20151231	
			"ukraine and teach people"	1	Z-006112764	Z-006112765	USDJ-20151231	
			china and "laying strategy"	1	Z-006112764	Z-006112765	USDJ-20151231	1 hit on 2/26/2012 4:36pm; 1 additional doc produced by USDJ

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<b>Document Name</b>	First Bates	Last Bates	Searches Conducted		Search	Results	Received Production	Notes
					First Bates	Last Bates		
SEC Trial Exhibit 13	Z-006041294	Z-006041295	Apply smart filters: Sender address equals avalonfaltd@gmail.com Recipient address equals cndt168@gmail.com Sent date equals 9/16/2013	1	Z-006041294	Z-006041295	USDJ-20151231	
			nomura and "limit anything"	1	Z-006041294	Z-006041295	USDJ-20151231	
			nomura and "is there anyone else"	1	Z-006041294	Z-006041295	USDJ-20151231	

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Document Name	First Bates	Last Bates	Searches Conducted		Search Results First Bates Last Bates		Received Production	Notes
SEC Trial Exhibit 14	Z-006127628	Z-006127629	Apply smart filters: Sender address equals avalonfaltd@gmail.com Recipient address equals cndt168@gmail.com Sent date = 10/18/2013 Search in email subject for "WTS release limit"	1	Z-006127628	Z-006127629	USDJ-20151231	1 hit on 10/18/2013 6:02pm; 1 additional doc produced by USDJ
			"latency software" and "risk assessment"	1	Z-006127628	Z-006127629	USDJ-20151231	1 hit on 10/18/2013 6:02pm; 1 additional doc produced by USDJ
			"detect and reject orders" and "manipulative behavior"	1	Z-006127628	Z-006127629	USDJ-20151231	1 hit on 10/18/2013 6:02pm; 1 additional doc produced by USDJ
			"15-c of the sec" and "forbid any layering"	1	Z-006127628	Z-006127629	USDJ-20151231	
			"looks like lek is the only solution for now"	1	Z-006127628	Z-006127629	USDJ-20151231	
			"increase their limits" and "last week to 50 orders"	1	Z-006127628	Z-006127629	USDJ-20151231	